

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
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Modernizing the E-Rate)	WC Docket No. 13-184
Program for Schools and Libraries)	
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**Reply Comments of
Communications Workers of America**

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November 8, 2013

The Communications Workers of America (“CWA”) submits these reply comments in response to the Commission’s Notice of Proposed Rulemaking (“NPRM”) seeking comment on proposals to update the E-rate program of support to schools and libraries.¹ CWA represents 700,000 workers in communications, media, airlines, manufacturing, and public service who have a deep interest in the E-rate program both as workers in the industry and as individuals and family members whose communities are enriched by the support the E-rate provides to their neighborhood schools and libraries.

In our initial comments, CWA expressed our wholehearted support for Commission action to update the E-rate program to bring greater broadband capacity to our nation’s schools and libraries.² In those comments, we articulated broad principles for E-rate reform. Having reviewed the voluminous initial comments submitted to the Commission, CWA further refines those principles. CWA urges the Commission to update the E-rate program based on these four principles:

1. *The Commission should increase funding for the E-rate program.* Current funding, set at \$2.38 billion, is inadequate to meet current need, much less support higher-capacity networks and inside connections necessary to meet growing demand in schools and libraries. Commentators representing schools, libraries, and others have urged the Commission to double the size of the fund to provide schools and libraries across the country the support they need to realize the full potential of high-speed Internet connections to improve education and meet public demand at libraries.

¹ *In the Matter of Modernizing the E-rate program for Schools and Libraries*, Notice of Proposed Rulemaking, WC Docket No. 13-184, July 23, 2013 (rel).

² See Comments of Communications Workers of America, *In the Matter of Modernizing the E-rate program for*

2. *The Commission should implement contribution reform to expand the base of support for E-rate and other universal service programs.* In order to meet the funding needs of schools and libraries, the Commission should simultaneously take action on universal service fund (USF) contribution reform. The current system is woefully out of date, assessing USF contributions solely from customers of long-distance and international voice telephony. It is long past time for the Commission to update the USF contribution system to conform with the way people use communications today, and to ensure that all users of today's any-distance Internet-based communications system contribute equitably to support affordable, universal service. While E-rate commentators have identified elimination of support for paging, voice telephony, and several other services as ways to provide some additional sources of funding for broadband E-rate services, meeting the needs of schools and libraries will require substantial additional funding, and that will require USF contribution reform to broaden the base of support.

3. *The Commission should establish high-capacity connectivity metrics for E-rate supported schools and libraries..* The Commission should adopt the SETDA and ConnectED targets for school system connectivity of 100 Mbps increasing to 1 Gbps per 1,000 users and Wide Area Network (WAN) of 10 Gbps per 1,000 users as *minimum* benchmarks for school connectivity, while acknowledging that the needs of schools and libraries will vary depending on geography (rural, urban, or suburban), existing network infrastructure, and characteristics of the school and library facilities. The Commission should establish a program to measure and publicly report schools' and libraries' progress toward these benchmarks.

4. *The Commission should use the E-rate as part of a larger program to spur job-creating investment in high-capacity networks to the surrounding community. The Commission's E-rate rules should therefore discourage support to private networks, and should coordinate E-rate funding with the Connect America Fund to spur deployment in high-cost rural areas.*

Students, parents, and library patrons need more than high-speed connectivity at school. They also need high-speed broadband connections at home to access the video- and data-rich applications on the Internet to do homework, research projects, communicate with teachers and administrators, and collaborate with others. By lowering the cost of high-speed broadband deployment to anchor institutions, the Commission can change the economics of broadband expansion to surrounding homes and businesses as well. E-rate support that brings fiber to anchor institutions can also serve to change the business case and increase high-speed deployment to neighboring homes and businesses, while at the same time creating high-skilled, career jobs. This principle applies not only in unserved or underserved rural areas, but also in areas with limited access to truly high-speed connections. Therefore, the Commission should establish E-rate rules that encourage funding to networks that also serve the surrounding community rather than to private networks that serve only community anchor institutions.

In unserved or underserved areas, it may be possible to link E-rate support with the Connect America program to lower the cost of deployment in unserved and underserved communities, thereby improving the economics of broadband and making more efficient use of universal service funds. In this proceeding, the Commission should seek ways to bridge its multiple universal service goals to increase the availability and affordability of high-speed

network deployment, broadband adoption, and expanded Internet capacity to schools and libraries.

The E-rate program has been one of the great success stories flowing from the Telecommunications Act of 1996, opening access to the unlimited information and resources on the Internet to students and library patrons in almost every community across this nation. Building on this success by ensuring adequate E-rate funding, establishing realistic yet aggressive metrics to bring a minimum of 1 Gbps capacity to our schools and libraries, using the E-rate to change the economics of widespread broadband deployment represent important steps forward in building next-generation public-private initiatives to upgrade our communications networks serving schools, libraries, and all Americans.

Respectfully Submitted,

A handwritten signature in black ink, reading "Debbie Goldman". The signature is fluid and cursive, with the first name "Debbie" and last name "Goldman" clearly distinguishable.

Debbie Goldman
Communications Workers of America

November 8, 2013